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5 Attorneys for Crisis Collections Management, LLC  
6

7 IN THE UNITED STATES DISTRICT COURT  
8 FOR THE DISTRICT OF NEVADA  
9

10 TIMOTHY HARRIS, Pro Se

CASE NO: 2:11-CV-01490-RCJ-CWH

11 Plaintiff,

12 vs.

13 CRISIS COLLECTIONS MANAGEMENT,  
LLC; FORD MOTOR COMPANY dba  
14 FORD MOTOR CREDIT COMPANY; and  
DOES 1-10,  
15

Defendants,  
16 \_\_\_\_\_/


17 **DEFENDANT CRISIS COLLECTIONS MANAGEMENT LLC'S JOINDER IN**  
18 **DEFENDANT FORD MOTOR CREDIT COMPANY'S MOTION TO DISMISS**  
19 **[AMENDED COMPLAINT] WITH PREJUDICE OR, IN THE ALTERNATIVE,**  
20 **MOTION FOR SUMMARY JUDGMENT AND THE POINTS AND AUTHORITIES IN**  
**SUPPORT THEREOF**

21 Defendant Crisis Collections Management ("CMC"), through Kent R. Robison of  
22 Robison, Belaustegui, Sharp & Low, respectfully submits this joinder ("Joinder") to Defendant  
23 Ford Credit dba Ford Motor Credit Company's ("Ford Credit") Motion to Dismiss with Prejudice  
24 or, in the Alternative, Motion for Summary Judgment (Doc. # 9) to the extent that Ford Credit's  
25 motion is treated as a motion to dismiss. CMC fully incorporates and adopts the points,  
26 authorities, and arguments of Co-Defendant Ford Credit, to the extent that they may apply to  
27 CMC and are deemed in support of a motion to dismiss. Plaintiff's Amended Complaint should  
28 be dismissed with prejudice as against CMC.

1 CMC notes that this Joinder is being made pursuant to Federal Rule of Civil Procedure  
2 12(b)(6).

3 DATED: This 4<sup>th</sup> day of November, 2011.

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5 ROBISON, BELAUSTEGUI, SHARP & LOW  
6 A Professional Corporation  
7 71 Washington Street  
8 Reno, Nevada 89503

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10 KENT R. ROBISON  
11 Attorneys for Defendant  
12 Crisis Collections Management, LLC

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28 J:\WPData\Krr\1236.001\P-Joinder in Ford's motion to dismiss.11-02-11.wpd

**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I certify that I am an employee of ROBISON, BELAUSTEGUI, SHARP & LOW, and that on this date I caused to be served a true copy of the **DEFENDANT CRISIS COLLECTIONS MANAGEMENT LLC'S JOINDER IN DEFENDANT FORD MOTOR CREDIT COMPANY'S MOTION TO DISMISS [AMENDED COMPLAINT] WITH PREJUDICE OR, IN THE ALTERNATIVE, MOTION FOR SUMMARY JUDGMENT AND THE POINTS AND AUTHORITIES IN SUPPORT THEREOF** on all parties to this action by the method indicated below:

☒ by placing an original or true copy thereof in a sealed, postage prepaid, envelope in the United States mail at Reno, Nevada, addressed to:

TIMOTHY HARRIS  
4005 Cherokee Rose Avenue  
North Las Vegas, NV 89031

*Plaintiff pro se*

☒ by using the Court's CM/ECF electronic service system addressed to:

TIMOTHY HARRIS  
4005 Cherokee Rose Avenue  
North Las Vegas, NV 89031  
Email: [extremeps1@cox.net](mailto:extremeps1@cox.net)

*Plaintiff pro se*

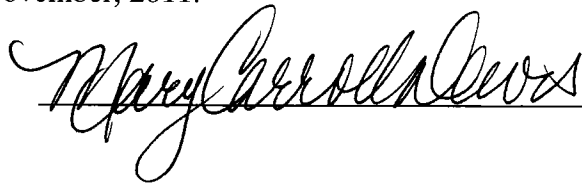
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☐ by personal delivery/hand delivery

☐ by facsimile (fax)

☐ by Federal Express/UPS or other overnight delivery

DATED: This 4<sup>th</sup> day of November, 2011.



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